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December 7, 2015

Via ECF

The Honorable Sam A. Lindsay
United States District Judge
1100 Commerce Street
Room 1544
Dallas, TX 75242

Re: *Highpoint Risk Services, LLC, et al. v. Companion Property and Casualty Insurance Company*, Case No. 3:14-cv-03398

Dear Judge Lindsay:

Undersigned counsel represents Companion Property and Casualty Insurance Company in the above-captioned matter. On December 4, 2015, the parties and their counsel participated in a mediation in Washington, DC, in an attempt to resolve comprehensively this case as well as the issues raised in the United States District Court for the District of South Carolina, *Companion Property and Casualty Insurance Company v. Wood, et al.*, Case No. 3:14-cv-03719 (the "South Carolina action"). The Honorable Benson Everett Legg, the former Chief Judge of the United States District Court for the District of Maryland, served as mediator.

The December 4 mediation lasted approximately 10 hours. Although the parties did not resolve their disputes, the parties and Judge Legg believe that, under Judge Legg's auspices, they may be able to do so after the exchange of certain information and a follow-up mediation session to be held on or about February 18, 2016. To that end, the parties jointly request that the Court temporarily stay all litigation activities and deadlines in this case until February 18, 2016. This stay will allow the parties to focus their efforts on preparing for, and engaging in, an informal, focused exchange of documents and other information that the parties and Judge Legg believe will put them in a position to potentially resolve all issues in both this case and the South Carolina action.

The parties understand and acknowledge that Your Honor has advised that there would be no further extensions of current deadlines. The parties hope that Your Honor will reconsider

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this position, particularly given Judge Legg's view that a stay would permit a significant chance of resolution of all issues.

Accordingly, the parties respectfully request that the Court enter an Order that immediately stays all current and upcoming deadlines in this case until February 18, 2016. Counsel for plaintiffs (Highpoint and Aspen) have reviewed and approved this letter request. Judge Legg, who has also reviewed and approved this letter, has agreed to answer any questions Your Honor may have. His contact information is below. A letter substantially identical to this letter and requesting the same relief is being sent to the judge presiding over the South Carolina action.

Respectfully submitted,

/s/ John L. Thompson on behalf of

Harry Lee

cc: The Honorable Benson E. Legg (via email)
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